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# BIG DESERT GRAZING

## Final Environmental Impact Statement

Prepared by Department of Interior  
Bureau of Land Management  
Idaho  
1981



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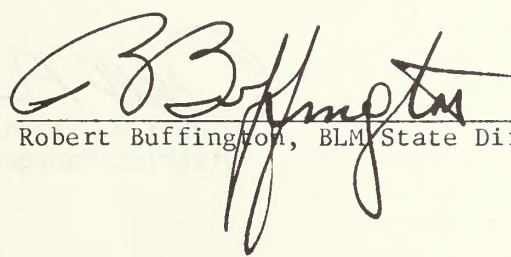
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DEPARTMENT OF THE INTERIOR  
FINAL ENVIRONMENTAL IMPACT STATEMENT

PROPOSED RANGE MANAGEMENT PROGRAM  
FOR THE  
BIG DESERT AREA

(To Be Used With Draft)

Prepared by  
DEPARTMENT OF THE INTERIOR,  
Bureau of Land Management

  
Robert Buffington, BLM State Director

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# United States Department of the Interior

BUREAU OF LAND MANAGEMENT  
 Idaho Falls District  
 940 Lincoln Road  
 Idaho Falls, Idaho 83401

We have forwarded for your review and comment the final environmental impact statement (EIS) on proposed range management in the Big Desert area of southeastern Idaho. The Idaho Falls District Office of the Bureau of Land Management prepared the statement conforming to Section 102 (2)(c) of the National Environmental Policy Act of 1969.

The statement describes and analyzes the economic, social and environmental effects of the proposed action and four alternatives for grazing management on 1,162,463 acres of public land.

This final statement differs from past procedures when the entire draft statement was reprinted in the final. This statement includes only those changes that are necessary in the draft EIS and responses to public comments received on the draft EIS.

This document, used with the draft statement, constitutes the final environmental impact statement. This final EIS is not the decision document. The decision will be based on the analysis contained in the final EIS, the BLM's personnel and budget constraints, public concerns and comments, and other multiple-use resource objectives or programs. No action can be taken for at least 30 days following filing of this statement with the Environmental Protection Agency and distribution to the public. A brief summary document outlining management direction for the Big Desert area will be prepared and made available as soon as a decision is reached. More specific decisions will then be developed on an allotment-by-allotment basis.

Thank you for your interest and participation.

Sincerely,

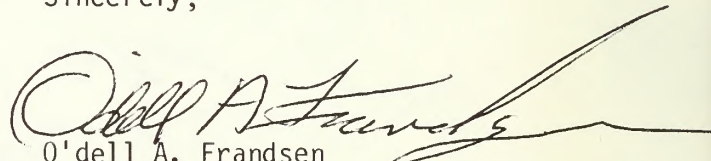
  
 O'dell A. Frandsen  
 District Manager

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BIG DESERT GRAZING

ENVIRONMENTAL IMPACT STATEMENT

( ) Draft (X) Final Environmental Impact Statement

1. Type of Action: (X) Administrative ( ) Legislative

2. Responsible Agencies:

- a. Lead Agency: Department of the Interior,  
Bureau of Land Management
- b. Cooperating Agencies: None

3. Abstract: The Bureau of Land Management (BLM) proposes to implement a grazing management program on 1,162,000 acres of public land in Bingham, Blaine, Bonneville, Butte and Power counties in eastern Idaho. This statement analyzes the economic, social and environmental effects of the proposed action and four alternatives. The proposal and alternatives analyze different levels of vegetative allocations to wildlife, livestock and other uses. It analyzes alternative methods by which livestock grazing would be managed as well as necessary support facilities (such as, water developments, fencing, brush control and revegetation projects). Alternative Four of the Big Desert grazing statement is selected as the preferred alternative.

4. Comments Have Been Requested and Received from the Following:

See Reviewers and Respondents Section.

5. Date Draft Statement Made Available to EPA and the Public:

Draft: March 30, 1981

Final: August 1981

## SUMMARY OF PROPOSED ACTION AND ALTERNATIVES

### PROPOSED ACTION

Proposed use for the area is to allocate 60,640 AUMs for active grazing use by livestock and 932 AUMs for wildlife. After 20 years, it is estimated there would be an additional 31,766 AUMs which could be allocated to livestock and wildlife. Grazing management proposed for the 582,989 acres consists of rest rotation grazing on 70,032 acres, deferred rotation on 229,425 acres, seasonal grazing on 281,294 acres, and custodial management of 2,238 acres of public land along the Snake River.

The proposed range improvements include 9 wells, 38 miles of pipeline, 36 water troughs, 3 reservoirs, 25 water storage tanks, 82.5 miles of fence, 12 cattleguards and 8 miles of road. The potential exists to control sagebrush on roughly 80,500 acres, of which 10,200 acres could be revegetated with desirable plants. An additional 7,800 acres could be seeded without brush control.

### Impact Summary

Vegetation would improve in quality and quantity, providing increased forage for both livestock and wildlife.

Wildlife habitat would remain stable or improve in condition. The availability of water is the limiting factor in the unit; the proposed range management program would improve wildlife habitat through increased water availability. Soil erosion would generally decrease and watershed conditions would improve slightly.

The number of hunter days would increase with the increase in wildlife populations.

Ranch consolidation and conversion would not be impacted by the Proposed Action. Capital position would be slightly impacted until sufficient AUMs are regained to restore all operators to their current active preference.

### ALTERNATIVE 1 - NO ACTION

The current livestock grazing program would continue. The active grazing preference would remain at 65,217 AUMs. This alternative assumes that the average, annual licensed use for the last 5 years (43,641 AUMs) would continue at this level.

No additional project development or land treatment projects for livestock grazing would occur. Project development for other resource activities would continue under present programs.

## Impact Summary

Range condition and vegetation production would show slight improvement. Present erosion and soil compaction would continue. Watershed conditions would not be expected to change much from current levels. Wildlife distribution and numbers are expected to remain the same.

### ALTERNATIVE 2 - NO LIVESTOCK GRAZING

All livestock grazing on public lands would be eliminated. All existing grazing privileges and cooperative agreements for range improvements would be cancelled. Salvage rights would be granted to range users who had contributed to range management facilities. Use on intermingled State and private lands would be possible if the landowner or lease holder of the State tract were able to fence lands away from public lands. Forage on public lands would be reserved for wildlife and other resource values.

## Impact Summary

All public rangeland in the area would show a long-term improvement. Soil compaction and erosion would decrease on all allotments. Complete removal of livestock would result in little change in wildlife populations from the present situation except that competition for forage would be eliminated. Hunting, fishing and camping opportunities along the river, and hunting and wildlife observation opportunities in the desert would be reduced.

This alternative would have severe impacts on the local livestock industry. As many as 50 permittees might be expected to sell, consolidate, or convert their ranches to other uses.

### ALTERNATIVE 3 - INCREASED LIVESTOCK USE

This alternative would implement livestock grazing management without changing existing AUM levels or season-of-use. Livestock would not be limited to any specific utilization levels. Use up to the present active grazing preference of 65,217 AUMs would be allowed. No grazing above this total grazing preference would be authorized until monitoring and studies clearly indicate that additional grazing would be allowed. Grazing systems identified in the Proposed Action would be implemented in this alternative.

Under this alternative, increased levels of land treatment are proposed. Sagebrush would be controlled through burning, spraying or chaining on 116,086 acres. An additional 36,807 acres would be seeded and receive brush control. These range projects would increase livestock forage production. Project size and species limitations would maximize livestock forage production. Livestock reductions would be made during and following land treatment to ensure adequate rest for plant recovery or establishment.



## Impact Summary

This alternative would have short-term impacts due to grazing beyond the carrying capacity on 15 allotments. Positive impacts to vegetation would occur once land treatments become established. The long-term annual soil erosion rate would increase. Wildlife populations would be expected to decrease slightly. Opportunities to hunt big and upland game and for wildlife observation would decrease. Neither ranch consolidations or capital position would be impacted.

### ALTERNATIVE 4 - GRAZING REDUCTIONS WITH MINIMAL RANGE IMPROVEMENTS

Alternative Four of the Big Desert Environmental Impact Statement is selected as the preferred alternative.

Implementing this alternative would provide the range improvements needed for proper range management. It appears to be preferred by most persons submitting comments, and it is the most cost-effective of the various development alternatives and the Proposed Action.

Forage would be allocated exactly the same as the Proposed Action.

Seasons of use and grazing systems would be the same as described in the Proposed Action, except that seasonal grazing is proposed for Bowers, Cox's Well and Klempel allotments. Four allotments would be combined to create two new allotments: Moonshine and East Butte, and Riverfield and AEC Riverfield. By combining these allotments, reductions would be eliminated in the AEC Riverfield allotment. In both cases, deferred grazing systems could be applied without additional fencing costs.

Grazing management would be transferred to the Idaho Department of Lands as described in the Proposed Action.

The vegetation resource would be managed more intensively, and would lead to substantial improvements in range condition and trend.

Vegetation manipulation would be limited to burning on poor and fair condition range only. Projects would be built on allotments receiving reductions, except for Rock Corral and Big Desert sheep allotments. The proposed projects are necessary for implementing grazing systems and improving livestock distribution.

## Impact Summary

Range condition and trend would substantially improve. Cover would be expected to increase and erosion and compaction would decrease. Sufficient forage would be available for present and future wildlife populations. A 39 percent increase in the antelope population and an 11 percent increase for sage grouse are projected. Land treatment would cause significantly less impact than the Proposed Action.

The number of hunter days would be expected to increase 10 percent over the next 10 years. Neither ranch consolidations or capital position would be significantly impacted.

## ADDENDUM

This section contains corrected information that will change the economic analysis of Alternative 4.

### Page 29

#### Table 2-18 Project Development and Maintenance Cost, Alternative 4 - Grazing Reductions with Minimal Range Improvements

Table 2-18 in the draft was in error and should be corrected as presented in the following revised table. This change will not affect the analysis of forage allocation, future AUMs, soils, recreation or wildlife.

The change will increase the cost of project development and maintenance for Alternative 4. These corrections will change the economic analysis presented in Chapter 4, Alternative 4. The revised economic section follows.

### Page 119

#### Income: Regional

The BLM would spend \$922,000 to install range improvements and perform land treatments. Roughly \$169,000 of this amount would be spent in the local economy. Maintenance of the range improvements would cost \$12,100 annually, \$7,300 of which would be spent locally.

Implementation of this alternative would increase the number of big game and upland game hunter days and would cause an income gain of \$3,200 annually by the twentieth year.

Income changes due to changes in AUM levels, construction activities and recreation create additional, or secondary, impacts in the regional economy. Initially, these secondary impacts would be an annual income gain of \$27,000. This would gradually change until by the twentieth year the secondary impact would be an annual income loss of \$9,600. These secondary gains and losses would be spread throughout the entire regional economy.

The net present worth of the regional income changes associated with this alternative would be +\$872,100.

TABLE 2-18

Project Development and Maintenance Cost  
Alternative 4 Grazing Reductions With Minimal Range Improvements

Project	Proposed Unit	Unit Cost	Total Cost	Existing Projects	Maintenance Responsibilities	Annual Maint. Cost/Maint.	Annual Maint. Cost Existing & Proposed
Pasture fence	32 miles	\$2,600	\$83,200	111	Permittee	\$80	\$11,440
Pipeline	24 miles	\$5,000	\$120,000	.25	Permittee	\$200	\$4,850
Well	3	\$35,000	\$105,000	3	BLM	-	-
Reservoir	3	\$8,000	\$24,000	34	BLM	\$100	\$3,700
Brush Control	58,200 acres	\$7	\$407,400	3,240	BLM	Unknown	
Plow & Seed	4,800 acres	\$20	\$96,000				
Troughs	15	\$1,000	\$15,000	Unknown	Permittee		
Storage Tanks	4	\$6,000	\$24,000	1	BLM		
Cattleguards	7	\$3,500	\$24,500	20	BLM		
Roads	5 miles	\$4,500	\$22,500	Unknown	BLM		
			<u>\$921,600</u>				

Summary

This alternative would initially create an annual income gain of \$121,000 in the local livestock industry. By the end of 20 years, this would have changed to an annual loss of \$92,000. Roughly \$922,000 would be spent by the BLM on range improvements, \$169,000 of which would be spent locally. Annual maintenance of the range improvements would cost \$12,100 of which \$7,300 would be spent locally.

Secondary income gains would initially be \$27,000 annually. By the twentieth year this would change to an annual loss of \$9,600.

The net present worth of the regional income changes would be +\$872,100.

There would be an initial employment gain of 11 jobs. After 20 years this would have changed to a loss of 4 jobs.

Neither ranch consolidations nor capital position would be significantly impacted by this alternative.

Comparative Analysis of Impacts

The following corrections should be made to Alternative 4.

Range Improvements

Construction	
Total	\$922,000
Spent Locally	\$169,000
Maintenance	
Total	\$ 12,100
Spent Locally (annually)	\$7,300

Secondary Income Changes

Year 1-5	+\$27,000
6-10	+\$10,000
11-15	+ \$210
16-20	- \$9,600
After 20	- \$9,600

Regional Net Present Worth \$872,100

## CONSULTATION AND COORDINATION

The Big Desert Draft Grazing Environmental Impact Statement (EIS) was filed with the Environmental Protection Agency and released to the public on March 30, 1981. The public review period ended May 29, 1981.

A public hearing on the draft was held May 5, 1981, at the Bonneville County Courthouse, Idaho Falls, Idaho. The hearing was attended by 16 people, 5 of who presented oral testimony on the adequacy of the draft EIS. BLM responses to the substantive portions of each testimony are presented in this final. A copy of the public hearing transcript is on file at the BLM Idaho Falls District Office.

About 350 draft statements were distributed for review to individuals; federal, state and local governments; and to non-government organizations. All written comments are reproduced in the final. Substantive comments are identified; the BLM response follows the comment. Oral testimony not submitted in writing but with substantive comments is responded to.

All comments will be considered in making final decisions on rangeland management in the Big Desert area.

## REVIEWERS AND RESPONDENTS

The following list identifies all agencies, organizations and individuals to whom copies of the draft EIS were sent. Those individuals, agencies and organizations who returned written or oral comments are denoted by a comment and page number.

<u>Federal Agencies</u>	<u>Comment</u>	<u>Page</u>
Department of Agriculture		
Agricultural Research Service - Aberdeen		
Agricultural Stabilization and Conservation Service		
Farmers Home Administration		
Soil Conservation Service	29	40
U.S. Sheep Experiment Station - Dubois		
Department of Interior		
Bureau of Indian Affairs		
Bureau of Land Management - State Offices		
Bureau of Land Management - Idaho District Offices		
Fish and Wildlife Service		
Geological Survey		
Heritage Conservation and Recreation Service	10	20
National Park Service		
Office of the Secretary, Western Field Office		
Department of Justice, U.S. Attorney		
Department of Energy	20	27
Environmental Protection Agency	16	25
National Advisory Council on Historic Preservation	1	13
 <u>State Agencies</u>		
Idaho Department of Fish and Game	28	38
Idaho Department of Lands		
Idaho State Clearing House	22	35
Idaho Deputy Attorney General		
Idaho State University		
University of Idaho		
University of Idaho Extension Service		
Colorado State University		
Idaho Division of Health and Welfare	18	26
 <u>Organizations</u>		
Ada County Fish and Game League		
AEC Sportsmen's Club	9	19
Bonneville Sportsmen's Association	19	27
Eagle Rock Longrifle Association		
Federation of Western Outdoor Clubs		
Friends of the Earth		
Idaho Archaeological Society		

	<u>Comment</u>	<u>Page</u>
Idaho Cattlemen's Association	30	42
Idaho Chapter of the Wildlife Society	3	15
Idaho Conservation League	2	14
Idaho Environmental Council	5	17
Idaho Historical Society		
Idaho League of Women Voters		
Idaho Wildlife Federation	4	16
Idaho Woolgrowers		
Natural Resource Defense Council, Inc.		
North Bingham Soil Conservation District		
Public Lands Council		
SE Idaho Rod and Gun Club	24	36
Sierra Club, NW Office		
Snake River Audubon Society		
South Bingham Soil Conservation District		
The Institute of Ecology		
Trout Unlimited		
West Side Soil Conservation District		

#### Local Government

Bingham County Commissioners  
 Bingham County Planning and Zoning Commission  
 Blaine County Commissioners  
 Blaine County Planning and Zoning Commission  
 Bonneville County Commissioners  
 Bonneville County Planning and Zoning Commission  
 Butte County Commissioners  
 Butte County Planning Commission  
 Butte County Extension Agent  
 High Country RC&D  
 Lost River Community Library  
 Power County Commissioners  
 Power County Planning and Zoning Commission  
 Shoshone-Bannock Business Council  
 Southeast Idaho Council of Governments

#### Elect Officials, Federal

Rep. George Hansen  
 Sen. James McClure  
 Sen. Steve Symms

Elected Officials, State

Rep. Steve Anton  
 Rep. W. Rusty Barlow  
 Sen. C. E. "Chick" Bilyeu  
 Rep. Dwight W. Horsch  
 Rep. Kurt L. Johnson  
 Rep. Elaine Kearnes  
 Sen. Israel Merrill

Rep. Mack Wm. Neibauer  
 Rep. Raymond G. Parks  
 Rep. Gary L. Paxman  
 Sen. John Peavy  
 Rep. Martin Trillhaase  
 Sen. Dane Watkins  
 Sen. J. Marsden William  
 Rep. Darwin L. Young

Individuals

All permittees in the Big Desert EIS area (87)		
Reuben H. Babcock	23	35
Henry Etcheverry, Minidoka Grazing Association	11	21
Jack Goddard	27	38
Mr. and Mrs. Harold Smith	13	22
Tom Stroschein	17	26
District Grazing Advisory Board (7)		
District Advisory Council (10)		
Jay Anderson, Idaho State University	21	32
Paul Beebe, Idaho State Journal		
Patrick Carnahan	7	18
Jack A. Dotson	17	26
Elanco Products Company		
Brad George	15	23
Craig Groves		
Karl E. Holte	25	37
David Letendre	6, 8	18, 19
C. W. Mulhall	12	21
Ken Sanders, University of Idaho		
Lee Sharp, University of Idaho		
R. D. Veith	26	37
Dee Williamson		



COMMENTS AND RESPONSES

All letters and public hearing comments were reviewed and considered in the preparation of the final EIS.

Although all public comments will be considered when management decisions for the Big Desert area are made, only comments that presented new data, questioned facts or the adequacy of the impact analysis were responded to in this final EIS.

Response to Letters

Each letter received during the review period is presented with a response(s), where appropriate, following the letter. Each substantive comment has been numbered, with the response to each comment following the letter. The letters are presented in the order in which they were received.

Response to Public Hearing Testimony

All oral testimony was reviewed from the public hearing transcripts. Comments that required a response are quoted verbatim and are followed by the response. The remainder of the hearing transcript is available for review at the Idaho Falls District Office.

**Advisory  
Council On  
Historic  
Preservation**

1522 K Street, NW  
Washington, DC 20005

Reply to:

Lake Plaza South, Suite 616  
44 Union Boulevard  
Lakewood, CO 80228

①

April 21, 1981

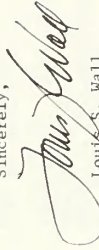
Mr. O'dell A. Frandsen  
District Manager  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

Thank you for your request for comments on the draft environmental statement for the proposed range management program for the Big Desert Area of Eastern Idaho received April 9, 1981. Pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969 and the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800), we have determined that the environmental statement is inadequate because it does not demonstrate compliance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. Sec. 470f, as amended, 90 Stat. 1320). The final environmental statement must include evidence of compliance with the stipulations of the Programmatic Memorandum of Agreement which was executed between the National Conference of State Historic Preservation Officers, the Bureau, and the Council and which was ratified on January 14, 1980. A copy is enclosed for your convenience.

Thank you for this opportunity to review and comment on the environmental statement. If you have any questions or require further assistance, please do not hesitate to call Charles M. Niquette at (303) 234-4946, an FTS number.

Sincerely,



Louis S. Wall  
Chief, Western Division  
of Project Review

Enclosure

1-a

1-a. Add the following paragraphs to the draft EIS on page 53, E. Cultural Resources.

Because of the size, 1,162,463 acres, included in the Big Desert grazing study, a comprehensive survey to identify all historic and cultural properties that might be eligible for inclusion in the National Register of Historic Places is impossible. However, the BLM has completed an existing data (Class I) inventories of the entire area and identified 2 properties that are included in the National Register and 170 properties that appear to meet the criteria for inclusion in the National Register. In addition, a field sample (Class II) inventory was conducted.

More information about these inventories can be obtained upon request from the Idaho Falls District; however, specific site information on archaeological sites is confidential and will only be made available to State Archaeologists. The inventories were conducted in accordance with the Programmatic Memorandum of Agreement between BLM and the Advisory Council on Historic Places, dated January 14, 1980.

The BLM recognizes that some of the activities involved in implementation of the rangeland management program could affect historic and cultural properties. Because of this fact, the BLM will conduct intensive field (Class III) inventories of specific areas that would be impacted by implementing activities prior to approval. If historic or cultural properties are identified, every effort will be made to avoid adverse effects. However, where that is not possible the BLM will consult with the State Historic Preservation Officer and the Advisory Council on Historic Places in accordance with the Programmatic Memorandum of Agreement by and between the Bureau and the Council, dated January 14, 1980, which sets forth a procedure for developing appropriate mitigative measures to lessen the impact of adverse effects.



2

May 5, 1981

Mr. O'dell Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

Re: Big Desert EIS

The Idaho Conservation League favors adoption of Alternative Four over the proposed action for the Big Desert area management. The loss of 18,000 acres of sagebrush to a grass monoculture and construction of 83 miles of fence as in the proposed action could have serious effects on the wildlife resources (especially antelope) in this area. We feel there are problems with the projections of recreation use, as you show a 50% increase in hunter days with the proposed action, but a 40% decrease with Alternative four. We find no reasons for this, based on the information contained in your EIS. We are concerned that recreation use other than ORV and hunting use were not addressed. What are they and how much occurs? We suspect some hiking, camping, photography, etc. occur in this area.

We also do not understand the wildlife number projections (how they were determined). If water developments were the criteria, then Alternative three should show similar wildlife increases as the proposed action; it does not. The manipulation of the range through plowing, spraying and seeding is usually detrimental to species diversity and stable wildlife populations. Since the proposed action has much more of this type of activity than Alternative four, we see no reason why less wildlife would occur under Alternative four than the proposed action and would like to see this problem addressed. Regardless of the alternative selected, the use of less destructive methods of range management (burning and chaining) are recommended over plowing or spraying. Burning has often been found to be beneficial to wildlife populations if properly designed.

The cost of the proposed action appears excessive in relation to the gains, \$1,758,000 to increase grazing by 48,000 AUM's, whereas Alternative four shows a cost of \$654,000 to increase grazing by 46,300 AUM's, much less per AUM than the proposed action. We feel the extra money would be better spent for habitat improvement and restoration than for the minor increase in grazing noted.

In summary, we find Alternative four to be the most favorable management option, but would like to see our concerns on the recreational use addressed in the final EIS.

Sincerely,  
*Pat Ford*  
Pat Ford, Executive Director  
Idaho Conservation League

100% RECYCLED

2-a. The 40 percent decrease shown on Table 2-9 page 33 for hunter days is in error. This should have been a 40 percent increase.

2-b. Recreation use was addressed in Table 3-11, page 55 and in Appendix I-2, pages 104 and 105 of the draft EIS.

2-c. A comparison of Tables 4-6 and 4-7 to 4-22 shows that additional acres of crucial fawning and wintering areas would be impacted. Comparing Tables 4-8 and 4-21 shows that more acres of good and fair range would be affected under Alternative

3. These additional treatments are large enough to limit the population and offset the benefits of water developments.

2-d. There would be a 61 percent decrease in the number of water developments installed in the EIS area in Alternative 4 as compared to the Proposed Action. The fewer water sources for this alternative gives a corresponding decrease in the antelope and sage grouse population.

3-a. The predicted increases in antelope and sage grouse were based on the amount of habitat that would be made usable due to increased water sources and based on the present population. These numbers represent the potential for increase if habitat is made available.

3-b. Chaining and seeding are practical treatment methods. Method for treatment will be determined on-the-ground at the time of project layout. See Chapter 2, page 18, paragraph 2. Chaining may have less impact than plowing and seeding and was included in the analysis. Plowing and seeding is planned only for problem sites, such as poisonous and noxious weed areas, or areas where no perennial seed source exists.

STATEMENT  
on the  
BIG DESERT EIS  
BY

Idaho Chapter of the Wildlife Society

3

The Idaho Chapter of the Wildlife Society recommends that alternative four be selected for the Big Desert Planning Unit, instead of the proposed action. The Proposed action would convert 18,000 acres of sagebrush to grass and add 82.5 miles of fence. This could have serious consequences for antelope since this is an extremely important antelope area. Excessive fence construction could cause serious problems for migrating antelope. We do not believe the proposed action will result in the increases in antelope and sage grouse populations predicted in the EIS. Alternative four will allow a substantial increase in domestic livestock grazing without excessive destruction of wildlife habitat.

3-a

We feel that the proposed action is fiscally irresponsible since it recommends spending \$1,758,000 to increase grazing by 48,044 AUM's, an average cost of \$36.60 per AUM gained. Alternative four would cost only \$654,000 to increase grazing by 46,289 AUM's, an average cost of \$14.14 per AUM gained. The 1755 AUM's gained in the proposed action over alternative four would cost \$1,103,000. This is an average cost of \$628 each. At the present grazing fee of \$2.31 per AUM it would take 272 years to pay for the extra AUM's gained by the proposed action over alternative four. The net result is a 150% increase in spending to achieve a grazing increase of 4% over alternative four. The proposed action also calls for 150% more yearly maintenance costs than alternative four. If any cost-benefit ratio is applied, alternative four is clearly preferable to the proposed action.

We understand that brush control in the Big Desert is necessary, and support the burning projects. Burning usually leaves a mosaic pattern of burned and unburned areas and can be beneficial to wildlife populations if done correctly. Plowing and seeding or spraying and seeding are generally detrimental to wildlife populations because brush is nearly eradicated in the treatment areas. We feel that chaining and seeding is a better treatment measure because it allows some brush to be left for wildlife while increasing grass for domestic stock. In the EIS the 8LM does not appear to have considered the use of chaining and seeding. This is a true multiple-use management practice as called for in the Organic Act. Plowing and seeding is basically a single-use management practice.

3-b

Thank you for providing the opportunity to comment on this EIS.

4

General input of polled members of IDAHO WILDLIFE FEDERATION, FIFTH DISTRICT, on proposed range management program for THE BIG DESERT AREA. Having received and reviewed the EI's of 1981, ALTERNATIVE #1, NO ACTION. It is not considered as acceptable.

ALTERNATIVE #2, NO LIVESTOCK GRAZING is not acceptable or feasible.

ALTERNATIVE #3 Increased livestock use could be feasible and beneficial to livestock permit and if the projection of wildlife occurs as proposed, they will benefit also.

As the draft reads, the proposed use for the area is to allocate 60,640 AUMs for active grazing use by livestock and 932 AUMs for wildlife. After 20 years, it is estimated there would be an additional 31,766 AUMs which could be allocated to livestock and wildlife.

The proposed 88 reduction of grazing AUMs for a total of 59,917 AUMs This would still be 16,000 AUMs above the 5 year average. The plowing and seeding has varying effects for different species and involves a higher cost of work done. Plowing and seeding appears to run between \$25 and \$30 per acre. The grazing would be reduced until the vegetation is stabilized. If the normal average acreage is 10-15 acres per AUM, and we see that on crested wheat grass the acres AUM are 3 acres a unit, it is apparent that crested wheat grass is one of the grasses that should be used. The negative side of this is that plowing would kill preferred forbs and native grasses. These forbs are the ones that antelope feed on. The plowing would change the 5500 acres of FAIR 1 range to POOR 2 for antelope.

Plowing and seeding would have impact on the sage grouse. The Big Butte strutting ground could be made unusable. It is the only identified ground in the Big Butte allotment. Several other areas of strutting grounds and nesting grounds would also be affected. (See Chapter 4, page 77)

According to the ecological conditions chart by percentages, we see a change in 20 years from:

	PRESENT	FUTURE
Poor	7%	3%
Fair	49%	49%

Good	18%	36%
Treated	8%	10%
Disturbed by fire	19%	2%

This shows a good percentage of vegetation increase projected. The draft summary states wildlife habitat would remain stable or improve in condition. The availability of water is the limiting factor in the unit. The proposed range management program would improve wildlife habitat through increased water availability. Soil erosion would generally decrease and watershed conditions would improve slightly. There are no significant watershed problems under the present situation. Adverse impacts would include a short term loss of vegetation productivity on 80,500 acres proposed for vegetation manipulation. Land treatments could alter 21 sage grouse strutting grounds and degrade existing visual resources.

If land treatment could or would alter 21 sage grouse strutting grounds there is concern with brood rearing areas. The sagebrush canopy cover is believed to be best at 15 to 30% canopy cover. With two to two and a half feet high cover best. This is also best for winter grounds. This tall brush could be chained with a U shaped drag to leave desired amount of cover or if more clearing is desired, it could be dragged with J shape drag, then seeded. Burning or dragging would also control brush for the 5 to 10% sagebrush required for antelope. The 5 to 10% would mean 25 to 30% vegetation production would be sagebrush which the sage grouse also feed upon. Chaining at approximately \$13.50 per acre, then level livestock stocking of ground would be better for wildlife benefit than plowing the ground.

Table 2-3, page 9, shows that alternative #3 would cost approximately \$2,538,900 to implement. In 20 years, this action would show an increase of 31,766 AUMs or a total projected 92,406 AUM total.

Alternative #4, same page shows a total of 88,862, or a total of 3,221 AUMs less than alternative #3. The total cost or #4 alternative is shown as \$654,600. That leads us to the fact that 3,221 AUMs will cost \$1,674,300. That seems to be a high price to pay for so few AUMs.

Our feeling and suggestion is that alternative #4 be used. With the chain dragging, either U or J, depending on the need of the area and the need of the canopy cover.

Some controlled burning would be effective. The stock driveway should be plowed and seeded. A close look taken at Webb Spring to see if the proposed increase in troughs and pipeline development possibly would have the effect of drying the spring up.

Stabilize livestock level for the period needed to promote the level of forbs and vegetation needed for both livestock and the wildlife. Alternative #4 would be much less expensive to implement. It would provide very nearly the same ADUs as

#3. It would save the adverse impact of short term loss of vegetation productivity. If chained in strip drags and U shaped drag, it would not alter the 21 sage grouse strutting grounds or wipe out the brood raising areas.

The statement is made in the draft EIS that fences would increase the risk of antelope mortality. We feel that as few fences as absolutely necessary are to be put in and the ones that are, should have a 16" to 18" high bottom wire for antelope to crawl as they move to feed on water or as they migrate.

The purpose of the proposed action is to provide adequate forage in the long term to stabilize the local livestock industry and to meet wildlife needs. We feel that alternative #4 should best do this economically and by so doing, #4 would best benefit wildlife in the area.

Submitted by

Terry L. Hayes  
Chairman Fifth District  
Idaho Wildlife Federation

4-a. Webb Springs would be supplying water to three pastures within the Big Butte allotment, but not to all three pastures simultaneously. It is not felt any further development of the spring is necessary, only additional pipelines and troughs.

# Idaho Environmental Council

P.O. Box 1708  
Idaho Falls, Idaho 83401

May 5, 1981

Comments on the BLM Big Desert Grazing  
Draft EIS

The BLM people who worked on the draft EIS for the Big Desert Grazing Proposal are to be commended for the obvious hard work they performed. However, the IEC does not agree with the conclusion, namely the Proposed Action. It would cause too much adverse impact on wildlife, with many miles of fences, brush control with spraying, plowing, and seeding, and would also waste money.

Alternative 4 would call for much less development and would produce much less impact on wildlife. It would also be much more cost-effective, and would still produce nearly as many increased ADUs as the Proposed Action.

Alternative 4 would entail 32 miles of fence instead of the Proposed Action's 83 miles. It would entail 5 miles of road instead of 8 miles; 15 miles of pipeline instead of 37; 3 wells instead of 9, and would call for spray and seeding and/or plow and seeding on 4800 acres instead of 18,000. Further, it would cost \$0.65/6 million instead of \$1.75/82 million. And it would produce an increase in grazing of 46,289 ADU, almost as much as the 48,000 ADU of the Proposed Action. But the cost per ADU gained over the 20 years would be only \$11.11, not \$36.30.

In other words, we can get 96% of the increased ADU's of the Proposal with Alternative 4, but with only 37% of the cost! This in addition to causing less damage to habitat.

Alternative 1, the No Action option, may be more cost-effective than Alternative 4; it's hard to tell from the EIS. But it is obvious that Alternative 4 is economically and environmentally superior to the Proposed Alternative.

We support the following:

1. Control of sagebrush by burning if it is done to resemble natural burns, which usually produce a mosaic of benefit to wildlife as well as to livestock.
2. Treatment of the 4800 sheep driveway. Chaining might be better for wildlife than plowing however.
3. A sheep turnout date of April 15th for the native grasses, and of April 1 for the existing crested wheatgrass plantings.
4. Status quo on land within the IMEL closed to grazing.

Thank you for the opportunity to comment.

*Terry Hayes*  
Terry Hayes  
IEC Board

Big Desert Grazing Draft EIS

Comparison of Proposal and Alt. 4 - Impacts and Costs

Fence Miles	83	32	51
Pipeline Miles	37	15	18
Road Miles	8	5	3
Wells	9	3	6
Reservoirs	3	3	3
Burn-Acres	70,500	58,200	12,300
Spray/Seed and Flow/Seed - Acres	18,000	4,800	13,200
20 Year Use - AUM	91,685	89,930	1,755
Existing Use - AUM	43,641	43,641	0
20 Year Gain - AUM	48,044	46,289	1,755
Cost	\$1,758,200	\$654,600	\$1,103,600
Cost/AUM Gained	\$37	\$11	\$23

TO WHOM IT MAY CONCERN:

AFTERING REVIEWING THE ALTERNATIVES OF THE EIS FOR THE DESERT AREA OF S.E. IDAHO, I BELIEVE THE "BURU" OPTION TO BE BEST FOR BOTH LIVESTOCK AND WILDLIFE - ESPECIALLY WILD LIFE.

THANK YOU

David Leandre  
1678 Garfield  
Idaho Falls, ID 83401

⑦

FROM: PATRICK CARKNATHAN  
97 LAWRENCE DR  
CONGRESSIONAL HILLS  
01106

DEAR SIRs,

I AM COMMENTING ON THE BIG DESERT GRAZING DRAFT ENVIRONMENTAL IMPACT STATEMENT.

I WOULD LIKE TO SEE ALTERNATIVE 4 IMPLEMENTED BUT WITH MORE CONSIDERATION GIVEN TO THE FERUGINOUS HAWKS AND LONG-BILLED CURLEWS. THESE ARE BOTH SENSITIVE SPECIES THAT NEST IN THE GROUND, AND WITH INCREASED GRAZING THEY MAY BE IRREPARABLY HARMED. I WOULD ALSO LIKE TO SEE LESS OFF ROAD VEHICLE USE.

I AGAIN WOULD LIKE TO SEE ALTERNATIVE 4 IMPLEMENTED WITH THOSE CHANGES MENTIONED ABOVE.

THANK YOU,

PATRICK CARKNATHAN

7-a

7-a. During the development of allotment management plans (AMPs), each allotment will be analyzed again. At this time, additional consideration will be given to areas used by sensitive species.

8

BLM -

Regarding the desert EIS -

I favor alternative #4 because

it is the most economic, and

the best alternative for livestock/wildlife  
taken together.

DAVID LETENDRE  
1678 GARFIELD  
IDAHO FALLS, ID

83401



9

May 14, 1981

O'dell Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

The AEC Sportsmen's Club has reviewed the Draft Environmental Impact Statement for Big Desert Grazing and recommends that Alternative 4 be adopted rather than the Proposed Action. Considering the total amount of environmental manipulation, the total costs, the increase in AUM's along with the incremental costs for the additional AUM's, we feel Alternative 4 is the most cost-effective approach.

The Proposed Action while reflecting a comprehensive development and range improvement program results in far more land subjected to radical treatment by spraying and seeding, resulting in less post-treatment diversity which is less preferable for wildlife. Treatment by burning or chaining should be used to the maximum extent.

The total increase in AUM's for the Proposed Action and Alternative 4 are similar yet for the 3% increase of 2821 AUM's allowed by the Proposed Action the cost increases by 168%. We question the prudence of such an expenditure.

Additionally, we question the accuracy of the following items in the draft EIS:

- 1. A projected 100% increase in antelope populations is attributable primarily to increased availability of water. The water will be drained by ranchers by September 15 to prevent freezing, yet mid-September to mid-October is an extremely dry period and any antelope dependent on new water development would have to move during this period. This probably would not support the increased population.
- 2. There is a 50% increase in hunter days under the Proposed Action while a 40% decrease in hunter days under Alternative 4, even though both actions produce increases in game species. This appears inconsistent, and recommend that Sportsmen's receive their fair share of the benefits.

We do not consider the other alternatives described in the draft EIS as viable alternatives when all factors are considered. Alternative 4 is a good course of action and recommend its adoption. We appreciate the opportunity to submit comments.

*Jim*  
Jim Solecki  
President

9-a. The higher price of the Proposed Action is due to more projects such as water developments and fences which provide for much better livestock distribution. The AUMs are similar under the Proposed Action and Alternative 4, but under Alternative 4 many of the AUMs would be unusable without the improvements. Also under Alternative 4, the cost of hauling water would be substantially higher without the water developments of the proposed action.

9-b. The livestock operators would drain only the pipelines around the control valves. There would still be water in troughs and tanks that will not be damaged by freezing because of their design. This water would be available for wildlife use until the snow provides necessary moisture. In addition, rainfall should provide sufficient supplemental water. The need for water should also be reduced due to cooler temperatures. Additional water independent of pipeline systems, such as guzzlers, would also be provided for wildlife purposes.

9-c. See response 2-a.



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
HERITAGE CONSERVATION AND RECREATION SERVICE

NORTHWEST REGION  
915 SECOND AVENUE, RM. 990  
SEATTLE, WASHINGTON 98174

(206) 442-4706  
1202-03  
DES 81/16

MAY 19 1981

Memorandum

To: District Manager, Bureau of Land Management, Idaho Falls District

From: Acting Regional Director, Northwest Regional Office

Subject: Big Desert Grazing Environmental Impact Statement Draft

We have reviewed the subject statement and find it adequate in all areas of our jurisdiction and expertise.

*Richard L. Winters*  
Richard L. Winters



Henry Etcheverry  
100 North 65 West  
Rupert, ID 83350  
May 25, 1981

Mr. O'dell Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, ID 83401

Dear Mr. Frandsen,

We, the members of the Minidoka Grazing Association, wish to go on record as being strongly opposed to the proposed April 15th opening date on the Big Desert.

Our organization has a unique arrangement with the Shoshone district concerning the opening of the grazing season. In latter March we, the permittees holding A.U.V's on the district together with BLM personnel, agree on an opening date depending on conditions of the feed and weather rather than depending on a set date regardless of feed conditions. We think of ourselves as good stockmen and responsible users of the public lands and we want only to preserve and improve the range. Therefore, we believe setting such a late date will not be in our best interest and it would serve no positive purpose for range improvement. Range readiness should be the determining factor for the opening date.

11-a

Sincerely,

*Henry Etcheverry*  
Henry Etcheverry  
Secretary - Minidoka  
Grazing Association

11-a. Phenological data and past history of use have shown that April 15 is a better average turnout date than April 1 on the Big Desert. We will continue to be flexible on this new turnout date as stated on page 13, paragraph 2. It is also recognized that crested wheatgrass ranges reach range readiness before native ranges.

C. W. MULHALL  
REAL ESTATE  
385 MAPLE ST.

IDAHO FALLS, IDAHO 83401

May 25, 1981

Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Gentlemen:

I would like to offer some comments on the Big Desert (razing Proposal, about which an article appeared in the May, 21, 1981 Post Register.

Our family have owned several thousand acres out on the west side desert for many years, about 40 years, in fact. We have watched many changes, and have, over the years done some developing of the land.

Our state is changing fast, and as the population grows, there is bound to be increasing pressure from those who wish to make money from the public lands, and government employees who cannot leave nature alone.

In my opinion, the most valuable long term use of the west side desert will be to keep your hands off it. Idaho still has a priceless heritage of open wild country, and this cannot survive when tampered with.

Idaho wild life cannot survive the destruction of their native habitat by the federal employees, or others who cannot leave nature alone.

For those on the federal payroll, it may seem like a good idea to invent these programs, in order to justify their jobs.

In my opinion, they do more harm than good, and will oppose doing anything at all to the land.

C. W. Mulhall

May 25, 1981

O'Dell Franzen  
Bureau of Land Management  
940 Lincoln Road  
Johns Falls Idaho 83401

Re: The Environmental Impact Statement  
Big Desert area of Eastern Idaho

On Chapter 3 Table 3-2

We do not believe the downward trend, that they show, in Smith allotment to be accurate on all pastures. In the winter (19) years that we have run our cattle on this area we have seen a vast difference in plant structure. The area is much more uniform as to grass plant numbers over the entire area. We do agree that the sagebrush that has invaded most of the range and big desert range, that we are familiar with, is keeping the grass from producing as it should. I believe and can prove without doubt that the invasion of new sage on the rangeland in the last several years has not been caused by the livestock grazing. If the stockmen took away half of livestock off the range it wouldn't make any difference in the amount of sagebrush.

We are not proposing an increase of use. But believe with needed control of sagebrush, by whatever means best suited for the area, and proper distribution of water, the big desert would easily support 10 to 30 percent more animal units than at present. Of Both livestock and wild life.

Mr & Mrs Harold Smith  
Smith Ranches Inc  
Barlington, Idaho 83331

TO O'DELL FRANZSEN

14

Topic: Testimony on the Big Desert Grazing Alternatives.

After reading over the Environmental Impact Statement on the Big Desert Grazing plan, I feel I must support Alternative 4, which calls for a grazing reduction with minimal improvements.

Being raised in the great outdoors of eastern Idaho, I have had many chances to observe first hand, a good deal of the Arco desert. I have seen some areas rich in wildlife value, but other areas have been so overgrazed by livestock, that its quality for wildlife is almost non-existent.

I am against any spraying or poisoning of any plants found on the Arco desert. If sagebrush must be removed, I would much rather see burning or plowing, but never spraying! The problem with spraying as I see it, is that 1) It is not selective in what it kills, and 2) Its affects are long lasting, both in the areas sprayed, and in the water system that it will eventually run into.

Tall sagebrush stands, though poor in food value to livestock, must be protected. These stands offer wildlife many valuable uses, 1) It offers nesting birds good sheltered areas in which to raise its young, 2) It offers big game animals like Pronghorn Antelope and Mule Deer excellent fawning grounds, 3) It offers all wildlife protection from predators, and 4) It offers all wildlife an excellent protection from the sun. Very few animals benefit from lands absent of cover, so the tall sagebrush stands can and must be protected from burning or plowing, and the over abundant livestock, which often ruin such areas.

13-a. Existing photo trend plots in each of the pastures in the Smith allotment show them to be in a downward trend.

When the minimal improvements are carried out, I hope barbed wire fences will not be added to existing fences. I have seen large numbers of wildlife like deer, antelope, and even owls, caught in these death traps, and in my opinion a needless death.

It is also my hope, that instead of using cow troughs to water livestock, that guzzlers would be used instead. Although wildlife like deer and antelope can use these troughs, many smaller mammals and birds cannot. Even if platforms were built upon them, birds like sagegrouse will refuse to use them, since they will only water with their feet on the ground.

When your improvements are carried out, if you keep wildlife and livestock in mind when deciding on how to carry out these improvements, then livestock and wildlife will both be able to flourish on the Arco desert.

Thank You  
Diana Bernick  
Brad George  
1265 Monte Vista  
Pocatello, Idaho  
83201

14-a. All water developments would be designed with multiple use in mind. This would include consideration for small game and birds, including sage grouse.

Jack A. Dotson  
R. R. Box 40  
Sterling, ID 83210  
May 27, 1981

O'dell Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, ID 83401

Dear Sir

The following is my comment on the Big Desert Grazing Draft Environmental Impact Statement, dated 1981.

15-a My first objection to the E. I. S. is that there is no rainfall statistics indicated in the five year study that was done during a drought period. There is no adjustment for normal or above normal precipitation averages.

Range conditions will improve normally with or without B.L.M. practices, with a layman's guess of 20 percent. I am all for range improvement but I do not want the rainfall forgotten. It is the most important part of desert range conditions and management must follow suit. It is hard for me to understand how, with the knowledge we have involved in this study, that it could be ignored.

15-a In this area we have had one of the worst droughts in history, especially in 1977 and 1978. There was only one-half inch of snow on the ground through winter. Page 38, present trend data is very much effected, but precipitation and rainfall is not mentioned.

15-b Page 39 of allotment 7000 shows considerable downward trend and note it is a sheep allotment. Most other cattle allotments are even. Yet on page 113, table 4-28, a twenty year projection shows a 64 percent gain in carrying capacity for sheep compared to much smaller amounts for cattle allotments. It is also apparent on pages 102, 95, and 89. All four alternatives show this. . . . I am left wondering why.

On page 107 under economics, the last half of the paragraph indicates that its economics, because there is not a long enough utilization of public lands and cheap fee. Yet, under your proposed action, it has its own solution to the problem. (Pages 62, 63, and 64. But on page 84 under sheep compared to cattle, it shows a 92 percent increase. No increase to cattle. It is necessary to refute this statement as being factual-for reasons (or purposes) of carrying capacity or damage to vegetation.

-1-

15-a. Rainfall data were considered and vegetation was adjusted accordingly. This information is presented in Appendix C-1, page 134, paragraph 4. More detailed rainfall data are available at the Idaho Falls District Office.

Looking at the economics in comparison of cattle to sheep, assuming that this is the reason for the statements and data, see pages 175 to 180. The first thing noticed is the low weaning weights and low percentage of calf crop and a high death loss. All of this is related to drought conditions. Sheep having mountain range also, were able to avoid most of it. If this study had been made in a normal weather pattern you would see 450# - 500# weaning weights and a higher percentage of calf weaners sold in the fall of the same calving year.

This in itself changes the economics to a great extent. Because there is no adjustment to weather or to the drought that we are recovering from

Another point of great importance is that on page 174, the projection factors that are used is on the low side of the cattle market, cycle 1974-1978.

In comparing the expansion of sheep grazing in comparison to any of the cattlemen, it should be realized that sheep men have a subsidized commodity of wool. Without this subsidy they would be short 10 dollars a ewe in their income. This puts cattlemen in an unfair economy on the same range.

I am not against the subsidy of the wool growers and the majority of the tax payers feel that it is necessary to keep the sheep men in business. I do object to its being expanded by all four alternatives in E.I.S. In this area there are fewer sheep every year and it is sad.

I don't know where the B. L. M. will get their additional A. V. M.'s to fill the added carrying capacity for sheep. There are many young ranchers that have just started out in the last 10 years that could utilize the range in and around their deeded ranches which have water. Still B.L.M. will not cooperate in leasing or permitting them to utilize public lands, but retain that privilege for a few.

All of this falls under the 14th amendment. It is very discriminating. Economics of the sheep or cattle business is to become larger, but not Barons. So I encourage you that we spread these large increases of A.V.M.'s to smaller private land owners who are bulging for expansion. They are in a much better position to take care of range because of their local position and their knowledge that if you destroy your land, you destroy yourself. The added income to these people would be put into their local economy with no subsidies necessary.

Yours truly



Jack A. Dotson

tm

cc: James Watt, Secretary of Interior  
cc: John Block, Secretary of Agriculture

15-b. The areas on the Big Desert sheep allotment in downward trend are almost exclusively limited to the livestock driveway transecting the allotment. Trend is down in this area because of the heavy use it receives each year.

The increase in AUMs on the Big Desert sheep allotment is due to several factors including:

1. Seeding 4,800 acres on the livestock driveway.
2. An 80,000-acre burn that occurred in the past which is still improving in range condition and increasing in vegetative production.
3. A 22,000-acre burn that has been proposed to control sagebrush.

15-c. The budgets used in this document were developed in consultation with ranchers in the EIS area. The weaning weights, calf crops, and death loss figures are based on data collected by the U.S. Department of Agriculture, verified by a sample of ranchers in the EIS area, and provided to all ranchers in the area for comment prior to their use. Any adjustments necessary, whether due to drought conditions, disease, low cattle prices or any other factor should have been identified at that time. Because no adjustments were identified, it was assumed that these budgets reflect the representative ranch operation in that particular group.

The inflation adjustment identified on page 174 is not related to the price of beef used in the budgets. On page 56, total regional and total farm income are discussed. The latest year for which this data was available was 1978. This data was compared to the 1974 level of total and farm income. Comparisons of this type must be done in equivalent dollar terms by removing the effect of inflation over the 5-year period. This was done by inflating the 1974 figures to equivalent 1978 figures as shown on page 174.


 REPLY TO  
ATTN OF: M/S 443

MAY 26 1981

 Mr. O'Neil Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Subject: Big Desert Grazing Draft Environmental Impact Statement (EIS)

Dear Mr. Frandsen:

Thank you for the opportunity to review this draft EIS. We support your objectives of improving watershed conditions and water quality, wildlife habitat, and increasing livestock, while improving overall range conditions. The DEIS is well organized and contains a very good discussion of the proposed action and alternatives. We are thus rating it LO-1, (LO - Lack of Objections, 1 - Sufficient Information).

One concept that should be further explained in the FEIS is the overall net benefits of providing increased spring grazing in groups 1 and 2, page 85. The DEIS states that animal unit months (AUM) would increase to 92,408 but "would translate into an income loss of \$120,000 annually after 20 years." In order for the ranchers to use these additional spring AUMs, the ranchers "would have to increase their herd size and carry these extra cattle the rest of the year." The high cost of alternative feeds would cause ranchers to lose money." If the ranchers would suffer a net loss by taking advantage of more spring AUMs, it seems reasonable that the ranchers would choose not to increase their herds. BLM's investment in intensive rehabilitation and management of those spring grazing units would then be wasted.

16-a

16-a. Every ranch operation is different. Some ranchers may be able to use the extra AUMs to be provided. They may have more private grazing lands and commercial leases available to them than does the "typical" ranch in groups 1 and 2. Current Bureau policy requires a benefit/cost analysis of each allotment management plan before it is implemented. At that time, those projects would be eliminated that have no benefits to livestock operators and insufficient benefits to other resources such as wildlife, soils and watershed to make a cost-effective investment.

Another concern is that once the BLM initiates intensive management, i.e., increases AUMs by 31,045 and doubles both deer and antelope populations, intensive monitoring and periodic retreatment will be necessary to actually improve range conditions and maintain projected animal population levels. Adequate budgeting will then be critical in order to avoid future reductions in grazing and/or numbers of wildlife.

16-b

16-b. Intensive monitoring would not actually improve range condition but would provide a means of determining trend. Adequate budgeting would be essential in achieving any of the objectives established for the area.

We appreciate the opportunity to submit these comments and look forward to further involvement in this project. If you have any questions regarding our comments, please feel free to contact either me or Scott Berg, of my staff, at (206) 442-1285 or FTS 399-1285.

Sincerely yours,

*Elizabeth Corbyn*  
Elizabeth Corbyn, Chief  
Environmental Evaluation Branch

cc: Idaho Operations Office

May 15, 1981

O'dell Frandsen, district manager  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

I appreciate the opportunity to make comments on the Big Desert Grazing Draft Environmental Impact statement. I believe this document is one of the more reasonable statements I have seen in the past few years. It only has 192 pages of material and I actually did read most of them.

Although I think the proposed action probably would be the best plan for the Unit, I don't think the additional costs generated would merit the additional costs of the proposed action or of alternative no. 3. I feel that alternative no. 1 is not realistic and alternative no. 2 is ridiculous.

Therefore, I support the basic considerations of alternative no. 4. There are, however, a few things I would question in the draft statement.

First, and most important to my operation, is the two to three week later turn-out dates. In considering the sheep grazing allotments, I concede that native range is normally not range-ready on April 1 and April 15 or 20 is a more reasonable turn-out time. However, the seeded areas within the allotment are usually range-ready about April 1-5. I would hope that the final impact statement would distinguish between native range and seeded areas and stipulate that the seeded areas would be given an earlier turn-out date if grazing conditions warranted.

Second, it is most imperative that the 4800 acre halogetan re-habilitation project be completed as rapidly as possible. This area is not only a hazard to livestock grazing, but it is a disgrace to the basic principles of range management and the environment.

Third, I would like to see an allotment system established in the Big Desert Sheep grazing allotment. Until an allotment system is initiated, along with the seasonal grazing systems, there can never be a decent distribution of animals and there will never be an improvement of range conditions because there is no incentive for individual operators to improve the area.

Fourth, I am certainly not opposed to wildlife and the wildlife habitat. However, considering the complete impact statement, I feel that the wildlife considerations were overstated and the cost benefit ratio is about as unrealistic as the basic concept in alternative No. 3. Livestock grazing is the basic use of the area and the major considerations should be based upon this use.

I fully believe in the multiple use concept, but, in relation to the amount of wildlife in this area, I think concern for most wildlife was overstated, whereas, the poor coyote wasn't even mentioned. I can personally verify that the coyote is more than adequate in numbers and that the health condition of the coyote is excellent because of his well-chosen diet.

Sincerely,

*Tom Stroschein*  
Tom Stroschein  
Stroschein Ranches, Inc.  
Box 76, Sterling, Rt.  
Aberdeen, Idaho 83210



# STATE OF IDAHO

DEPARTMENT OF HEALTH AND WELFARE

DIVISION OF ENVIRONMENT  
636 Pershing  
Pocatello, Idaho 83201

29 May 1981

Mr. O'dell Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

Thank you for the opportunity to review the Big Desert Grazing draft E.I.S. The Big Lost River is the only major stream in the area. It is classified as a special resource water but is intermittent below Arco. The other information in the text concerning water quality and quantity appear to be accurate.

If you have any questions, please contact this office at 236-6160.

Sincerely,

*Craig Shepard*  
Craig Shepard  
Senior Environmental  
Quality Specialist

db

CC: Henry Moran/Gordon Hopson

18-a. Addition to the text page 59, paragraph 5:  
The Big Lost River is classified as a special resource water but is intermittent below Arco.

17-a. Chapter 3, page 40, paragraph 2 addresses range readiness, and the fact that crested wheat-grass seedlings are ready for grazing about 5 days before native range.

17-b. Allotment management plans (AMPs) will be written in cooperation with livestock operators as soon as the EIS has been completed. An allotment system would be considered at that time.

17-a

17-b



IDAHO FALLS, IDAHO

19

28 May 1981

O'Dell Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Sir:

On behalf of the Board of Directors of the Bonneville County Sportsmen's Association, the comments below pertain to the Big Desert Draft Environmental Impact Statement (E.I.S.):

Your office is to be complimented on a job well-done. The draft E.I.S. appears to be a comprehensive and thorough study and more "readable" than some we've seen.

Of the alternatives proposed in the E.I.S., we recommend adoption of ALTERNATIVE #4 for these reasons:

- Wildlife and related outdoor recreation will be significantly increased.
- Seeding of the Big Butte (which would affect its visual resources) isn't required.
- Less vegetative manipulation required - hence less adverse impacts will result.
- Based on the current Federal Administration, the likelihood of receiving funds to implement your proposed cost alternative is very small. Alternative #4 is only 1/3 as expensive, and hence a more attainable alternative.

There seems to be an error in the Table 2-9 (2-19?) on page 31ff. The recreational potentials in this table for alternative #4 are listed as decreasing. However, the discussion of these subjects on page 118, plus other related information, indicates they would increase. We assume the table is in error, and make our recommendations from the written discussion.

Thank you for the opportunity to comment. We know preparing such E.I.S. must be a horrendous chore. But we're also sure that in the long term the resource and the public will surely benefit.

*Martin F. Huebner*  
Martin F. Huebner, Secretary

19-a

19-a. See response 2-a.



Department of Energy  
Idaho Operations Office  
550 Second Street  
Idaho Falls, Idaho 83401

20

MAY 20 1981

Mr. O'dell Frandsen  
District Manager  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, ID 83401

Dear Mr. Frandsen:

Attached are our comments on the Big Desert Grazing Draft Environmental Impact Statement. Thank you for giving us the opportunity to comment.

Sincerely,

*J. J. Beers*  
J. J. Beers, Assistant Manager  
Environmental, Safety, and  
Health Programs

Attachment:  
As stated

COMMENTS ON BIG DESERT GRAZING  
DRAFT ENVIRONMENTAL IMPACT STATEMENT

It is our opinion that alternative 4 would be more advantageous than the proposed action. A comparison of the predicted 20 year gain in AUM's for the proposed action yields an increase of only 4% over that for alternative 4. This small increase in AUM's would occur at an additional cost of \$1,103,600 over that for alternative 4.

Also alternative 4 would have less impact on wildlife since 32 miles of fence would be constructed as opposed to 83 miles of fence required for the proposed action. Since a sizable antelope population exists in the Big Desert unit, problems would be encountered with fencing of migration routes. The recommendation of constructing drop-wire fences is good. All fences should have a smooth bottom wire no less than 16 inches above the ground to allow antelope passage (see guidelines Appendix H). Also, the proposed land treatments in alternate 4 would be less harmful to wildlife than that outlined in the proposed action.

Over 34 thousand acres of the land in the Big Desert Area occur within the withdrawal lands for DOE's Idaho National Engineering Laboratory. Minimal comment is made within the DEIS on the type of habitat alterations planned for this area. Since the INEL lands are classified as the National Environmental Research Park, any proposed habitat alterations in this area should be discussed.

The concept of conducting vegetation manipulation projects in irregular patterns is good since this would create more edge in vegetative stands. However, of the possible land treatments, burning or chaining (chaining not discussed in document) would likely provide habitats mutually beneficial to wildlife and livestock. Neither treatment would result in a complete eradi-

20-a

-2-

cation of sagebrush, and a good forage cover could still be obtained. We support the burning and chaining projects. In contrast, spraying, spraying and seeding, and plowing and seeding are detrimental to wildlife populations. Studies at our laboratory have shown the detrimental effects of plowing and seeding on sage grouse, antelope, all birds and small mammals. Minimal information is provided on the type of seed (only listed as "desirable species", "desirable plants") that are to be applied after the treatments. A more detailed description of the seed mixture should be provided. Any planned seedings containing crested wheatgrass as a dominate seed should be avoided because of its adverse effects on wildlife.

Problems occur with several statements made in the document regarding the affects of the several alternatives on wildlife; we can find no data to support many of these statements. Noted below are some examples:

1. Statement: (Page 76) - The overall impact of the proposed actions on antelope would be beneficial. With the increased water and expanded habitat, antelope numbers are expected to increase. (Page 32) - Data in table indicates proposed action will result in 100% increase in mule deer, antelope and sage grouse populations.

Response: It may be naive to imply that by simply making water developments, we can double our wildlife population within 14 years. Surely, water is not the only critical factor affecting wildlife numbers.

There is a complex interaction between necessary requirements such as vegetation, water and cover as well as other critical factors (reproductive success, etc.). Also as stated on page 48, vegetation diversity is the key to good antelope habitat.

2. Statement: (Page 53) - Ferruginous hawks nest on the ground.

20-b

20-c



20-a. Map 2-2 and 2-3 (map packet, back cover) present land treatment projects and their general locations. There is only one land treatment project proposed for the INEL, and it occurs under Alternative 3: a seeding on the AEC Riverfield allotment. Because the ecological sites found on this allotment are similar to the rest of the Big Desert Environmental Impact Statement area, we felt no need to address this project separately. Environmental impacts for various land treatments were addressed in general for the entire Big Desert EIS area.

20-b. The Big Desert EIS area is in a low precipitation zone (8-16 inches per year), and a good variety of seed is not available for drier areas. We are limited in the seed mixtures we can try. A seed mixture we have used is Siberian wheatgrass, small burnett, yellow blossom, sweet clover, Lodak alfalfa and Wyoming big sagebrush.

20-c. Water was considered to be the most limiting factor on wildlife populations on the Big Desert. See page 72.

20-d. BLM Technical Note, TN-316, 1978 by Mayo W. Call, page 46, indicates that ferruginous hawks nest on almost anything that gives some elevation above the surrounding area. In largely treeless areas, such as the Big Desert, they usually nest on the ground.

20-e. It is a well documented fact that sage grouse leks have short vegetation, and it has been assumed that this makes the displaying males more visible to the females. Recent data from INEL, (Connelly, J.W., W.J. Arthur and O.D. Markham, 1981, "Sage Grouse Leks on Recently Disturbed Sites," Journal of Range Management, Vol. 34(2), pp. 153-154), indicates that "...newly cleared sites for displaying areas may have potential as a management tool." This evaluation included a burned area.

20-d

Response: Ferruginous hawks usually nest in trees with nesting occasionally occurring on the ground.

20-e

3. Statement: (Page 76) - Burning the sage grouse strutting grounds could open them up, making the displaying males more visible to females.
- Response: No data in literature to support such a statement.
4. Statement: (Page 11) - Additional forage would be allocated to livestock until the livestock operator's total grazing preference has been satisfied. This considers the fact that only wildlife use the lava areas that are not allocated for livestock grazing.

20-f

Response: Are there data to show the number of wildlife using lava areas? If so, provide facts. The relationship between the two above statements is not clear.

20-g

On page 10, Table 2-4, only 4 antelope ADM's are listed for allotment AEC Riverfield. During the mild winter of 1980/81, at least 125 antelope were in this area for approximately 5 weeks during late January, all of February and early March. Even in mild winters, antelope winter throughout townships TIN R29E and TIN and R28E. During more severe winters, many more antelope are in this area. The DEIS fails to mention the fact that in severe winters a large number (perhaps several thousand) of antelope migrate through the INEL site and down into the lower part of the Big Desert area. This has happened at least twice in the mid 1970's. Because of the migration during these severe winters, the importance of the area as a wintering area should receive additional emphasis and ADM allotments in the DEIS.

20-h

On pages 32 and 33 the antelope, mule deer and sage grouse populations under the proposed action are predicted to increase by 100%. Under alternative 4, they are predicted to increase only by 39 to 11%. In the proposed action

20-i

20-f. The last sentence on page 11 should be dropped from the text.

20-j

20-g. The wildlife use and location maps and population estimates were developed from the best data available.

10,200 acres will be plowed and seeded, 7500 acres will be sprayed and 7800 acres will be seeded. However, in alternative 4 only 4800 acres is scheduled for plowing and seeding. It is known from studies in the literature, that spraying, plowing and seeding have a detrimental effect on wildlife species. Therefore, on what basis was it decided that the proposed action with its much larger area of land treatment detrimental to wildlife would increase wildlife populations over that in alternative 4?

20-h

If in alternative 4, game populations are predicted to increase by 39 to 11% over the present populations, on what basis is the number of hunter days on page 33 predicted to decrease by 40%?

20-i

On page 43, paragraph 2 states that there are 5 sheep allotments in Section 3, but Table 2-7 lists only 3 allotments with sheep.

20-l

On page 51, (Non-game Birds and Mammals, Paragraph 1), the Brewer's Sparrow should be included in the list of sagebrush obligate bird species. Also, the last sentence in paragraph 1 is misleading: concentrations of Sage Sparrows west of Atomic City are indeed relatively high, but no more so than similar habitat elsewhere on the Snake River Plain. The number one small mammal species, in terms of numbers, and quite possibly biomass and ecological impact/importance is the deer mouse (Peromyscus maniculatus). This species is never mentioned.

20-k

On pages 76 and 77, the proposed action will impact 20 sage grouse strutting grounds and will also affect large areas of nesting habitat. To our knowledge, beneficial effects of fire on strutting grounds has not been demonstrated. Therefore, the conclusions in this particular section are questionable. Grouse do use moist areas as brood rearing areas. However, any moist areas created by water projects would be minor in relation

20-l

20-k. Add deer mice to the small animal list on page 51, paragraph 8. A complete listing is available at the Idaho Falls District Office.

20-l. See response 20-e.

to the size of the area and might not affect the overall population of sage grouse. Our studies are indicating that many sage grouse strutting and nesting in the Big Desert Area migrate into the Pingree, Aberdeen and Mosby Butte areas by hunting season. Therefore, reductions in strutting grounds could cause a temporary reduction in sage grouse hunting opportunities south of the management area.

Page 78-79. The immediate impact of land treatment (burning, seeding, etc.) on small mammals and birds would be detrimental. Studies on the INEL have confirmed this particularly in the first 5-10 years and relatively permanent detrimental affects occur where seeding of crested wheatgrass takes place. Since water sources occur over such a tiny portion of the entire area, the paragraph on the effect of water sources on non-game birds and small mammals is likely not valid. Also, the DEIS does not address the problem of livestock concentrating near water sources and eliminating any favorable habitat changes these water developments may provide for wildlife. Therefore, for these reasons, it is not likely that the non-game animal population will experience a "slight increase".

20-m

Map 2-1. Is the Big Butte allotment number 1046 in the right place (e.g., in the Big Butte Allotment)?

20-n

Map 2-3 lists both plowing and seeding along the Big Lost River on the INEL Site. We strongly oppose any plowing and seeding on the Site particularly along the river. This particular area is used by antelope as a fawning area and as a brood rearing area by sage grouse.

20-o

Additionally, map 2-3 (proposed action) in T2N, R28E indicates a fence in an area outside the grazed area which creates a fenced-in area or pasture which exists solely out of the grazing area. We have previously

20-p

20-j. Table 2-7 lists four sheep allotments: Big Desert, Huddles Hole, Moreland and Rock Corral. The other sheep allotment is the Katseanes allotment which is recommended to be managed by the Idaho Department of Lands.

20-h. See responses 2-c and 2-d.

20-i. See response 2-a.

20-m. The results of the INEL studies on the INEL are mentioned on page 79 of the draft EIS. Areas of wildlife habitat adjacent to the water developments would be fenced to protect them from livestock grazing. This is a function of the wildlife program and was not covered in this EIS.

20-n. The allotment number 1046 should be in the allotment to the left of where it is.

20-o. This plow and seed occurs under Alternative 3, Increased Livestock Use. Sites for this alternative were selected by using the natural potential. All sites would be looked at on-the-ground and coordinated with other agencies before implementation.

20-p. The fence shown on Map 2-3 and within the non-grazed area is in error and should not be there. It was our intention to have a buffer between grazed areas and the waste disposal site.

-6-

(July 23, 1980) commented on fences in this area indicating that they should be constructed only on the established grazing areas and kept to a minimum because of antelope migrations.

Many mourning doves nest in the Big Desert area. Although many of these birds leave the area at the beginning of the hunting season, this area does provide nesting habitat. Our studies have shown that halogeton is a favorite food of mourning doves on the INEL Site. Therefore, mourning doves should be discussed in the EIS and the effects of halogeton control on the doves should also be addressed.

20-q

20-q. The impacts of the Proposed Action on mourning doves were determined to be insignificant. This is due to the extreme adaptability and mobility of the doves. The 1975 Progress Report on Idaho National Engineering Laboratory Site Radioecology-Ecology Programs on pages 52-57 indicates that wheat is just as important to doves as halogeton, and that doves will fly over 19 km to feeding areas. The proximity of wheat fields, the amount of wheat available, the movement of doves to feeding areas and the equal importance of halogeton and wheat as food, support the no significant impact determination. Therefore, controlling a relatively small acreage of halogeton would not seriously impact doves.



Idaho State University  
Pocatello, Idaho

83209

27 May 1981

Department of Biology

O'dell A. Frandsen  
District Manager  
Idaho Falls District  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, ID 83401

Dear O'dell:

The following are my comments on the Big Desert Grazing Draft Environmental Impact Statement. I will first summarize my overall impressions and then detail some specific comments. The EIS Team is to be complimented for a diligent effort. Preparation of such a document from a scant data base covering such a large area is a rather overwhelming task. I found the document to be readable, concise, and quite comprehensive, although I was sometimes troubled by the level of generalization. I will point out areas where additional specificity would be desirable.

It is my impression that Alternative 4 is the preferred alternative from both ecological and cost/benefit standpoints. It is better than the proposed action from an ecological viewpoint because it does not include the spray or plow and seed treatments. Spraying reduces plant species diversity and decreases the availability of forbs which are important for many wildlife species (e.g., sage grouse eat a lot of wild lettuce in the late summer and fall). Furthermore, spraying tends to eliminate the natural nitrogen fixers from the ecosystem. We don't have any idea what the long term consequences of such treatments may be, but it would not be unreasonable to predict that soil fertility would decrease over time under such treatment.

The EIS recognizes the deleterious effects of creating monocultures, especially with relation to wildlife. Mariett's research on the IMEL has provided us some insights into the stability of the crested wheatgrass seedlings that are germane to your planned plow and seed treatments. We have found that their stability and exclusion of native species is not simply a matter of competition for resources such as soil moisture. Rather, seed dispersal into the seedlings is extremely limited and reserves of native seeds in the soils within the seeded areas are practically nonexistent. Thus, when openings occur within a seeding the probability is great that the spot will be occupied by another crested wheatgrass plant simply because their seeds are so abundant relative to the native species. Plowing and seeding will destroy most of the native seed reserve and decades (possibly even centuries) will be required before the "natural potential plant community" will be present on the site. Thus, the assumption (as on page 67) that such treated areas will become diverse natural communities is not supported by the facts. I doubt that it will make any difference whether such seedings are done with one or a few species; the result will be essentially the same -- native species will only very slowly invade the site.

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O'dell A. Frandsen  
27 May 1981  
Page 2

I suspect that there are some other subtle effects of plowing and seeding, but unfortunately there are no specific studies (to my knowledge) that would help. Plowing turns up the B horizons and brings a lot of calcium compounds to the surface. This would change the surface pH. Furthermore, plowing destroys the structure of the soil that has developed over eons. This structure is very important in determining infiltration rates; one would predict that infiltration would be lower on seedings than on native areas. This is not so important a concern for irrigated agriculture, but could be critical on a desert.

Is there a reason why chaining and seeding could not be used rather than plowing and seeding, except on the area where haloxeton control is needed? Chaining would reduce the "brush" cover, but would retain native seed reserves and soil structure. I would also support greater use of fire rather than spraying or plowing and seeding.

On page 18, it is stated that spraying is the only effective method for reducing threepip sage. Would not chaining be effective? Fire will also reduce its cover and vigor in relation to other species, despite its ability to sprout.

Are bluebunch wheatgrass and bitterbrush the only key species that will be monitored? If not, what others (especially forbs) will be included? (Page 20).

The name of Alternative 4 (Grazing Reductions...) is a misnomer. That alternative does not result in grazing reductions, as I read the statement. Rather, it results in fewer projected additional AUM's in 20 years. The name should be changed so that it does not automatically bias a reader's view.

If the proposed action results in more AUMs in 20 years than alternative 3, despite the fact that another half million dollars would be required for alternative 3, it would seem that alternative 3 is not really a viable one. I suggest that the much more cost effective alternative 4 become the proposed action and that #3 be dropped.

With regard to productivity estimates (pages 41 and Appendix C), it is well known that in arid regions there are more years with below average precipitation than with above. Thus, "normal" is something less than average. I think that more substantiation of your correction based on 65 percent of normal is needed. Perhaps a few clipped plots from 1981 (or 1980?) could be used for comparison.

Also in relation to methods, it is stated that standard errors and confidence intervals were computed, but apparently nothing was done with them. All of the productivity estimates in the document are treated as point estimates with up to three significant figures (eg. 186 lbs/acre on page 136) with no indication of errors or confidence limits. I do not understand why anyone would use an alpha level of 0.2 (page 134); that implies you are willing to be wrong one time in five! In fact, if you have standard errors on the productivity estimates then you should be able to put confidence limits on the current AUMs. That should be done! Then you could get some impression of whether the current 41,641 was really below the carrying capacity. I will wager that that figure will be within a 95% confidence interval, which would imply that you do not have sufficient data to tell whether current use is below carrying capacity.

21 - b

21 - c

21 - d

21 - e

21 - f

21 - g

21 - a

**21-h** One management strategy that would help to control shrubs and improve condition would be to switch cattle and sheep allotments periodically. Is that possible? If so, it should be incorporated and encouraged.

**21-i** Page 51: The list of small mammals is woefully incomplete. Deer mice are probably the most abundant of all. Numerous other species would be present.

**21-j** The value of 65,217 AUMs on page 63 appears to be erroneous. Pages 9 and 14 show 91,000. It is silly to report AUMs to five significant figures. This again reflects an implicit assumption that productivity is measured without error. It would be reasonable to round all such figures to the nearest thousand.

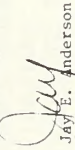
**21-k** Given the variability in vegetal cover on the area, I believe that it would be, for all practical purposes, impossible to distinguish between 59 and 61 percent cover. (Page 7 and elsewhere) In fact, my experience with some very intensive vegetation sampling (INEL Burn Site south of Howe) suggests that it would be essentially impossible to measure cover of sage/grass communities with greater than about ± 5 percent. A two percent projected increase is trivial and you will not be able to document it.

**21-l** Page 76: Will provisions be made for watering facilities to be operative all spring, summer, and fall and not just when livestock are present?

**21-m** What species will be used for seedings?

I hope these comments are useful. If you or members of your staff have any questions concerning them, I will be happy to discuss them. Please feel free to call me at 236-3145 (work) or 233-5338 (home).

Sincerely,

  
Jay E. Anderson  
Associate Professor  
Plant Ecology

**21-a.** The statement that treated areas would move toward the natural potential plant community was not in reference to seedings. It was in reference to spray and burn sites.

**21-b.** Refer to response 3-b.

**21-c.** Spraying would be the most cost-effective method for controlling these stands of threetip sagebrush. In the areas we are proposing to spray, there are many threetip seedlings and a reduced understory. Chaining works well on mature stands of sagebrush, but is not very effective on younger stands. Due to the reduced understory, these areas would be difficult to burn effectively.

**21-d.** In most cases, bluebunch wheatgrass and bitterbrush are the primary species that would be directly monitored. Other species are monitored indirectly in photo trend plots that would be established in each pasture. Allotment management plans will be written for each allotment. During their development, additional key species could be identified.

**21-e.** Grazing reductions refer to the initial stocking rate rather than the long-term forage production.

**21-f.** Adjusting vegetation production data to normal years production is very difficult. Determining a correction factor for adjusting production to a normal year is probably the weakest part of the inventory procedures. This is why we would continue to monitor each allotment for range condition, trend and utilization. We did go back and reclip several sites in 1980 on the Big Desert EIS area, keeping in mind that the spring of 1980 was well above average in precipitation. At this time, we plan on continuing these clip plot studies.

**21-g.** Low and high production values were calculated to give the variance from the mean production at an 80 percent confidence level. A standard error was added and subtracted from the mean production to give the low and high production. Standard error was calculated by:

$$SE = \frac{SD}{\sqrt{N-1}} \quad T$$

Where:

SE = standard error

N = number of samples

$$SD = \text{standard deviation} = \sqrt{\sum_{i=1}^N \frac{(x_i - \bar{x})^2}{N-1}}$$

T = T value at 80 percent confidence level for N-1

Examples: AGCR-POOR for 6 samples

$\bar{x}$  production = 335 lb/acre

SD = 164.43

$$SE = \frac{164.43}{\sqrt{5}} (1.476) = 108.5$$

Low = 226 lb/acre      High = 444 lb/acre

The low and high values were used on each allotment to determine where the allotment's carrying capacity occurred within these production ranges. This information is available at the Idaho Falls District Office.

21-h. Many of the allotments on the Big Desert EIS area are community allotments (more than one operator per allotment). Switching classes of livestock would be very difficult to organize under such conditions. There is a private sheep allotment and a private cattle allotment that are being considered for switching classes of livestock in some type of management scheme.

21-i. See response 20-k.

21-j. The current grazing preference is 65,217 AUMs. This preference should be restored by the year 2000. The 91,000 AUMs is a 20-year AUM projection assuming that our burns, seedings and management proposals produce expected results. Many of the 91,000 AUMs would not be available for livestock use because they would be allocated to wildlife and non-consumptives uses. We are aware that error exists in our inventory; this is why we plan to monitor each allotment.

Your suggestion for rounding off our production estimates will be taken into consideration. However, rounded numbers can be difficult to trace should the need arise.

21-k. The explanation for cover determinations can be found in Appendix C-2 beginning on page 135, paragraph 2. We were not implying that these were the exact cover figures. We were trying to demonstrate that cover will in most cases increase as range condition and trend improve.

21-l. See response 9-b.

21-m. Refer to response 20-b.

John V. Evans, Governor  
Daniel I. Emborg, Administrator



State Capitol Building  
Boise, Idaho 83720

**DIVISION OF ECONOMIC AND COMMUNITY AFFAIRS**

May 27, 1981

O'dell A. Frandsen  
District Manager  
Bureau of Land Management  
Idaho Falls District  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

The Idaho State Clearinghouse has completed its review on the BIG DESERT  
GRAZING DRAFT ENVIRONMENTAL IMPACT STATEMENT - SAI #00515824. The  
following agencies were contacted for their review and comment:

Region IV Development Association  
East Central Idaho Planning and Development Association  
Southeast Idaho Council of Governments  
Division of Economic and Community Affairs  
Department of Fish and Game  
Department of Parks and Recreation  
Department of Water Resources  
Department of Lands  
Idaho Historical Society  
Office of Energy  
Department of Health and Welfare/Division of Environment

At the time of sign-off, comments have not been received from the reviewing  
agencies. All late comments will be forwarded to your agency.

Thank you for the opportunity to assist you in the review of your Draft  
Environmental Impact Statement. Please send us a copy of your Final  
Environmental Impact Statement. If you have any questions, do not hesitate  
to contact myself or Lois Wade at (208) 334-4718.

Sincerely,

*Gloria Mabbutt*  
Gloria Mabbutt, Coordinator  
Idaho State Clearinghouse

GM/lw

- 1 -  
Bureau of Land Management  
Idaho Falls.  
May 29, 1981

Comments by Ouellet N. Bahrick - Range user in  
Ouellet Aspen Allotment.

(22)

In your draft environmental impact statement  
page 39 you say that the trend is static or  
stays about the same, in all pastures in the  
Ouellet Aspen Allotment, with this I am in  
agreement. I have been ranging cattle there for  
25 years. Every year the cattle have come off  
the desert I in good condition, some years  
a little better than others. We used to go to  
the desert with cattle about the 1st of April,

I think what makes the difference in the desert  
is the amount of spring rain  
if the range survey is made in a dry year  
or a year with unusual amount of rain it would  
not show a true picture so I don't think  
you can take a vegetation survey only one  
year and say this is it. Every year that  
I have went out there has been dry grass from  
the year before

23-a

I don't think a cut in numbers or in  
season of use is warranted.  
what determines the amount of vegetation  
that will grow is the rainfall  
I do agree that there are areas that need  
improvement and that I am all for.

23-b

I think that range should be provided for  
envelops deer slope growth etc. but not to try to  
increase numbers to much over what they are.  
I think that all those who use range for  
any reason should help pay for it and not

Just the livestock users. I think there have been too many years when we have seen no range improvement from the grazing. It is now good. Fees have been increased too much I think. I think that another well managed when near surplus east of Oakes. It would be useful and that proposed fence would help in management.

Too fast you turn out stock of cattle would be a hardship on me and I don't think it is necessary. I think it is delayed turn out stock is necessary soon years when we have seen mainly 15% spring. There has only been one of those in the last 28 years that I remember, about 4 years ago, that year I ran out of hay and then was more to buy.

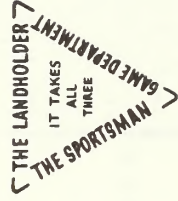
In all of the years I have been going to the desert I can see very little change in it, when it rains a lot there is lots of grass & when it doesn't rain there isn't so much that year.

Sincerely  
Gordon J. DeLoach  
Vernon DeLoach

23-a. It has been taken into account that the survey was conducted in a dry year. This information is presented in Appendix C-1, page 134, paragraph 4. Even though vegetation production figures have been corrected to reflect a normal year, we will continue to monitor range condition, trend and utilization on allotments for years to come.

23-b. The animals would increase naturally if the habitat is available; these figures are merely predictions of what could occur.

23-c. It has been determined through phenological data and past history of use, that May 1 is a better average turn-out date than April 16. We will continue to be flexible on this new turn-out date, depending on forage condition, as we have been in the past.



May 28 81

O'dell Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Mr Frandsen:

After reviewing the Big Desert Grazing Draft environmental Impact Statement, The Southeastern Idaho Rod and Gun Club can support only

Alternative # 4, because:

1. Vegetation manipulation is limited to burning. We believe that spraying is detrimental to wildlife and to plant diversity.
2. The reason that the range is in poor condition is that they graze it too heavily now as in the past and reductions are needed.
3. The other alternatives have too many fences
4. The other alternatives have too many roads and pipeline spring type developments.
5. The cost to the taxpayer is not excessive as the other plans are.
6. This plan is most compatible to multiple use without excessive detriments to any phase of use.

Sincerely,

Karl E. Holte, Ph D  
President.



28 May 81

(25)

Mr Odel Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

I have reviewed the Big Desert Grazing Draft Environmental Impact Statement.  
I support alternative # 4 because.

1. No developement should be done at all on Big Southern Butte.
2. No spraying is included.
3. Fence building is at a minimum.
4. the cost to the taxpayer is minimal.
5. Cattle and sheep grazing is in balance with the production ability of the range.
6. Recreation and other enjoyments can be accomplished with livestock use in the alternative.
7. I believe in multiple use and this is the only alternative which reflects true multiple use.

Sincerely,

Karl E. Holte, PhD

19 May 81  
432 S. 11th  
Pocatello, Idaho 83201

Odel Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

I support Alternative # 4 in the Big Desert Grazing Draft Environmental Impact Statement.

The others involve too much destructive activity to wildlife and the environment and are too expensive to the taxpayer. The livestock industry must also bite the bullet as the rest of us in this time of cut back.

In the others, I oppose the fences which are expensive and also damage free access to wildlife; In addition, I also oppose the spring development and pipelines. Nothing should be done on big Southern Butte in the way of development. No spraying should ever even be considered as we stopped it on our enemies in Viet Nam--why should we use it here on our own???

Sincerely in the interest of  
a better integrity of government  
and environment,

*R. P. Veith*

May 29, 1981

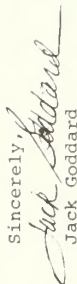
Goddard Bar 13 Ranch  
Star Route  
Mackay, Idaho 83251

Bureau of Land Management  
940 Lincoln Rd.  
Idaho Falls, Idaho 83401

Dear Sirs:

The Purpose of this letter is to protest the proposed grazing cuts on Cox's Well Allotment in the Big Desert Management Area.

We feel the method used to inventory range condition did not fairly or adequately evaluate available forage. We are therefore filing this protest with the BLM and are asking for another review or evaluation or whatever process outlined in EIS guidelines.

Sincerely,  
  
Jack Goddard



# STATE OF IDAHO

## DEPARTMENT OF FISH AND GAME

600 SO WALNUT ST. P. O. BOX 25  
BOISE, IDAHO 83707

May 28, 1981

Mr. O'dell Frandsen  
U.S. Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, ID 83401

Dear O'dell:

Our Department has reviewed the "Big Desert Grazing Draft Environmental Impact Statement" and recommend that Alternative 4 be adopted rather than the Proposed Action, for the following reasons.

1. Alternative 4 is much more cost-effective than the proposed action, under which the BLM intends to spend \$1.7 million to produce 91,685 AUM's, while alternative 4 would cost \$650,000 for 89,930 AUM's. This would be an extra \$1.1 million to increase production by only 3 percent (1,755 AUM's) over alternative 4. A cost of over \$600/AUM appears excessive and needs more justification than is described in the document.
2. Alternative 4 would not allow increased erosion on any allotments, while the proposed action would increase erosion on four allotments.
3. Alternative 4 has only 32 miles of new fence, while the proposed action has 82.5 miles. Since this is an extremely important antelope migration route, additional fences have the potential to block migration corridors, especially in deep snow years.
4. Alternative 4 proposes 4,800 acres of mechanical brush control and seeding, while the proposed action would involve 18,000 acres. Since many of these projects are on antelope winter range, we feel they would be quite detrimental to antelope. Alternative 4 would also reduce the undesirable effects of mechanical brush control on antelope fawning areas. We agree that the 4,800 acres along the stock driveway need to be plowed and seeded with a multi-species planting.
5. Alternative 4 would result in much less human disturbance in the area (road building, fence construction, well drilling, waterline and trough installation, mechanical brush control and maintenance of all these projects).

EQUAL OPPORTUNITY EMPLOYER

Additional comments specifically directed at the document contents are as follows:

28-a

We find it very difficult to understand how some of the conclusions in the EIS were reached. On pages 32 and 33 it states the proposed action will increase antelope, mule deer and sage grouse populations by 100 percent and hunter days will increase by 50 percent. It goes on to state that alternative 4 will increase deer and antelope populations by 39 percent and sage grouse populations by 11 percent, but that hunter days will decrease by 40 percent. It just is not logical that hunter days would decrease with an increasing wildlife population.

28-b

Page 76, Proposed Action, D. Wildlife - This proposes that 5000 acres receive herbicide treatment. This would adversely affect antelope habitat by reducing sagebrush and forbs. A recommended alternative should be for a controlled burn or no treatment.

28-c

Page 96, Alternative 2, No Grazing, D. Wildlife - It is stated, "Complete removal of livestock from the EIS area would result in very little change from the present situation, except that competition for forage would be eliminated." This statement completely ignores the problem that livestock/wildlife conflicts involve more than simply forage competition. A complete removal of livestock would greatly enhance the area for all species of wildlife. Water developments could be provided for wildlife rather than as an accessory to livestock troughs. There is an inference here that water developments for wildlife cannot be made unless there is livestock grazing.

28-d

Page 98, Alternative 2, G. Recreation - This states, "If grazing were eliminated from the EIS area, there would be no reason for the range program to maintain water sources." Isn't wildlife a bonafide value on public lands, requiring the BLM to maintain water sources?

28-e

Page 98, Alternative 2, Summary - states, "This alternative could reduce hunting, fishing and camping opportunities along the river and reduce hunting and wildlife observation opportunities in the desert." How the absence of livestock grazing could do this is beyond comprehension.

Page 104, Alternative 3, Increased Livestock Use - states, "Wildlife populations could be expected to decrease slightly under alternative 3." In considering the increase in competition and adverse impacts of land treatments to benefit only livestock, the adverse impact on wildlife would be the large areas planned for planting of crested wheatgrass, which is of little or no value to wildlife.

There are omissions of antelope winter ranges on Map 3-4. One of these is along the Big Lost River in the Riverfield Allotment. We do not have precise data about the extent of the wintering area because census flights on the Big Desert have been extremely limited. We feel the antelope population estimates in the EIS are low, but do not have any good data for reliable estimates.

We oppose the development of Webb Spring. There just is not enough water there to feed three troughs and still leave water for wildlife. Webb Spring is the major source of water for mule deer and many other species on Big Butte. We recommend that water in all troughs be managed by BLM personnel. If it is up to the ranchers they will turn it off when their stock leaves, drying up the water source for wildlife in the middle of the summer. This has been a chronic problem all over the region.

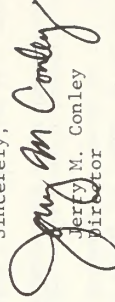
General Comments

There is a tendency throughout the statement to infer that good livestock management requires livestock use every square foot of the area. Areas unused by livestock or forage left untouched by livestock is judged to be an unsatisfactory situation. Some areas presently unused by livestock due to a lack of water are being programmed for livestock water developments. Ungrazed areas are valuable as wildlife sanctuaries and should continue to be managed as such.

We do not understand how the BLM determined that the proposed action will increase wildlife populations more than alternative 4. We feel very strongly that the proposed action is far more detrimental to wildlife than is alternative 4.

We appreciate the opportunity to comment on this document and request our comments be considered when the proposed Action is adopted.

Sincerely,



Jerry M. Conley  
Director

cc: Region 5  
Region 6  
Clearinghouse SAI#00515824

28-a. See response 2-a.

28-b. See response 21-c.

28-c. Additional problems between livestock and wildlife are addressed on page 97 under beneficial and adverse impacts of this alternative. Water developments could be developed for wildlife even if there were no grazing by livestock. This would be accomplished by the wildlife program and is not covered under this grazing EIS.

28-d. See response 28-c.

28-e. See page 98, paragraphs 3 and 4.

28-f. See response 20-g.

28-g. See response 4-a.

28-h. The Big Desert EIS area will always have areas that are unused by livestock. Good livestock distribution is important in order to improve range condition and trend and to maintain rangelands at these higher condition levels. If rangelands are in better condition, both wildlife and livestock should benefit.

28-i. See response 2-d.

United States  
Department of  
Agriculture



Soil  
Conservation  
Service

Room 345  
304 North 8th Street  
Boise, Idaho 83702

June 4, 1981

Mr. O'dell Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, Idaho 83401

Dear Mr. Frandsen:

Thank you for the opportunity to review and comment on the Big Desert Grazing Draft Environmental Impact Statement. Following are our comments:

**29-a** Chapter 2, page 4, Table 2-1 - What specific intensive range management activities are to be implemented on the INEL withdrawn lands?

Chapter 2, page 5, Objectives - Your objective is to reduce the disturbed area from 19% to 2% within 20 years - the disturbed area is described as "burned". If you are planning some controlled burns and will obviously still have some wildfires, is this possible? Perhaps, if our interpretation of disturbed is correct, your goal should not be to reduce the disturbed percentage but should concentrate on improving that potentially productive rangeland in fair ecological condition. Are the burned areas all in poor ecological condition?

Chapter 2, page 17, Reservoir Development - Any reservoirs which are sealed would probably require fencing to protect the seal.

**29-c** Chapter 2, page 18, Land Treatments, 1st paragraph, 3rd sentence - Any seedbed preparation planned on the 7800 acres? What success percentage would you expect on that acreage?

**29-d** Chapter 2, page 18, 1st paragraph, 8th sentence - This sentence and Map 2-3, proposed projects, do not appear consistent if judged against vegetation shown on Nap 3-1.

Chapter 2, page 19, 4th paragraph, 2nd sentence - Success would depend upon kind and age of sagebrush.

Chapter 2, page 18-19, 6th paragraph, last sentence - This may be neither possible or feasible. Would need to be site specific.

**29-e** Chapter 2, page 20, Monitoring Program, 2nd paragraph, 1st sentence - Sentence two and three are not possible if studies are conducted only at end of grazing season. To get a good picture of what is going on utilization studies should be taken during the grazing period.



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Department of Agriculture

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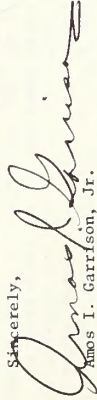
29-f

Chapter 2, page 20, Monitoring Program, paragraph 3, 4th sentence - key species listed here disagree with key species listed on page 40, second paragraph, first sentence; or the main or seeded grass species listed in Table 3-1 for 88,000 plus acres of land, i.e. ARTRW/ELC12, ARTR4/CAREX and AGR seedling.

Chapter 2, page 20, Implementation Schedule, sentence 1 - This may not be reasonable. It would not seem probable that the general public, the local economies or the national economies would support or require this. To accomplish this may result in serious damage to the private land resource and the local and national economy through increased demand on the private land resource and a severe reduction in local and national revenue through reduction in sale of red meat.

Immediate reductions may be warranted in areas showing an apparent downward trend. On areas of static or upward trends, reductions should be phased in over a longer period of time, consistent with planned management and supported by a monitoring program. Immediate temporary reductions may also be necessary on areas of planned vegetation manipulation.

Sincerely,



James I. Garrison, Jr.  
State Conservationist

Many burn areas could be considered in poor ecological condition because in most cases they would be lacking some of the main components of the potential vegetation community.

29-c. The 7,800 acres are dominated by annual vegetation, and no seed bed preparation was proposed. A rangeland drill would be used to introduce a perennial seed source. The success of this type of seeding would depend on the amount of precipitation.

29-d. When Map 3-1 (vegetation types) is compared to Map 2-3 (proposed projects and treatments, Proposed Action and Alternative 3), the proposed spray projects do occur on threetip sagebrush sites (Artr4).

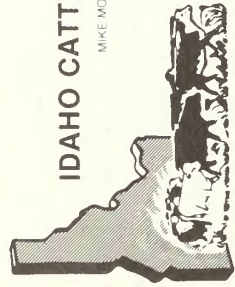
29-e. Chapter 2, page 20, paragraph 2, sentence 1 reads: "Utilization studies would be conducted during or at the end of the grazing season on use patterns."

29-f. Refer to response 21-d.

29-a. Most of the INEL withdrawn lands are not grazed. Both the Quaking Aspen and the Big Butte allotments have a pasture in the INEL, and all of the AEC Riverfield allotment is in the INEL. A rest rotation grazing system is proposed for the Quaking Aspen allotment, and a deferred grazing system is proposed for both the Big Butte and the AEC allotments.

29-b. The objective is to improve ecological condition, not decrease disturbed areas. As a result of improving ecological condition, disturbed acres would be reduced.

When we made our projections, it was assumed that proposed burns would be in fair or better ecological condition within 20 years. We realize there will be wildfires in the future, but did not try to estimate the number of acres that might burn. Burn areas were considered disturbances for purposes of this EIS.



## IDAHO CATTLEMEN'S ASSOCIATION

MIKE MOGENSEN, Executive Vice President

### OFFICERS

PRESIDENT Robert Swanson Pocatello  
VICE PRESIDENTS David Bivens Payette  
Thomas Prescott Jerome

June 8, 1981

Mr. O'dell Frandsen  
Bureau of Land Management  
940 Lincoln Road  
Idaho Falls, ID 83401

Dear Mr. Frandsen:

The following comments pertaining to the Big Desert Environmental Impact Statement are written on behalf of the Idaho Cattlemen's Association. We compliment you and your staff for the brief and concise manner this EIS was prepared. It is a drastic improvement over former EISs in Challis and Bennett Hills.

It is difficult for us to comment on each specific allotment or area within the Big Desert Area, however, we offer a few general comments which may be helpful to you in formulating the final EIS as well as the management plans in this area. The Idaho Cattlemen's Association supports multiple use management of BLM resources for food and fiber production, recreation, and other uses. We believe that multiple-use management must continue in this area as it has been practiced in the past.

Livestock grazing apparently is the primary resource use in this area, and we stress the importance of maintaining this resource use. The livestock industry is extremely important to the state and local economies.

The economic information provided on pages 55 and 56 implies that non-farm income has increased 73% since 1974 in this region

while livestock and farm income has declined up to 56% within the same time frame. It does state however, that total regional employment was 31,209 in 1978 of which agriculture was the largest employer. We encourage the BLM to re-examine this income information which implies that livestock and farm income are less significant than non-farm incomes. However, it does not consider that many non-farm industries heavily depend upon livestock and agriculture for their existence. Idaho's total economy and the regional economy of the Big Desert is based primarily upon agriculture. Without it other industries would be drastically reduced.

The cattle industry in Idaho produced over \$660 million gross income to the State of Idaho in 1980. BLM statistics show that approximately 52.5% of Idaho's cattle graze on BLM lands sometime during each grazing season. Approximately 340,000 cows graze on BLM lands each year. On an average Idaho calf crop, approximately \$153 million gross income is generated directly into the state's economy each year from the cattle industry. By using a multiplier of 9, which is the generally accepted figure used by range economist, the cattle industry on BLM lands in Idaho produces approximately \$1.377 billion dollars annual gross income to Idaho's economy through income generated by the cattle industry.

The EIS also contains proposed action which would reduce livestock grazing from 10% to 20% below the 5 year average use in the Big Desert Area while proposing to increase the allocation of forage for deer and antelope by over 100%. We believe that this proposed action conflicts with past multiple-use management procedures in the area. We urge the BLM to revise this proposed action to at least establish grazing levels at the five year average use or above, yet still allow viable deer and antelope herds. The level of non-use which has been exercised in this region illustrates that

the livestock producers have apparently been cooperating on management of the rangelands. The proposed action should also reflect this cooperation. Table 4-10 on page 84 shows that the cattle AUMs would be decreased from active preference by an average of 16% or approximately 5,000 AUMs. On the other hand, the sheep numbers have been maintained at the active preference which is actually above the average 5 year use. We encourage the BLM to reaccess these reductions of cattle numbers from 10% to 20% while increasing the allotment for deer and antelope by 100%. The cattle industry in this area deserves equitable consideration in resource allocation.

We believe that multiple use can be obtained without making the cattle industry sacrifice for the benefit of recreationalist who generally do not pay for the use of the land or help maintain fences, water facilities or forage quality. Through proper management, along with the proposed range improvement plans outlined in the EIS, we believe that livestock numbers could at least be maintained at current levels.

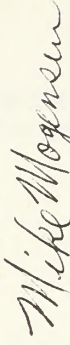
On page 13, proposed range improvements totalling \$1,157,200 are proposed for the Big Desert Region. However, it does mention that these range improvements are subject to available funding levels. We encourage the BLM to implement cooperative range improvement programs with permittees to provide continuity to these programs and save money where funding might be a problem.

In summary, we emphasize the importance of the livestock industry to the economy of this area. This factor along with balanced multiple-use management which does not sacrifice the livestock industry or wildlife should be written into this EIS. We stress that this EIS over emphasizes the importance of recreation and wildlife and under estimates the importance

30--b

of the livestock industry in the Big Desert Region. We encourage the Bureau to make positive changes to correct this inadequacy in the final EIS. We appreciate your consideration of our comments.

Sincerely,



Mike Mogensen  
Executive Vice President

MM/lkc

cc: Idaho Congressional Delegation  
Bob Swanson, President, ICA

30-a. On page 56, we said that farm income accounted for 15 percent of the total regional income. This makes the farm sector the third most important in the region behind services and government. A portion of the income generated on these industries results from activity in the farm/livestock industry. The livestock multiplier used on this EIS was 1.22. This means that for every dollar of income generated in the livestock industry, an additional 22 cents of income is generated elsewhere in the economy (largely services and retail trade).

30-b. The Proposed Action would result in a 27 percent increase in livestock use from the 5-year actual use, not a 10-20 percent decrease. We are proposing to increase forage for both livestock and wildlife. The 100 percent increase in deer and antelope numbers is only a projection. Because deer and antelope diets consist primarily of brush and forb species, their numbers could increase substantially with vegetation presently in the Big Desert EIS area with additional water developments.

Public Hearing Comments

Idaho Falls, May 5, 1981

Jerry Jayne - Idaho Environmental Council

31-a. I was surprised to see that the present net worth before the Proposed Action was higher than for Alternative 4 which just doesn't figure.

Response: The net present worth of the Proposed Action is higher than that for Alternative 4 primarily due to range improvement construction and maintenance. It was estimated that under the Proposed Action \$326,000 would be spent locally for range improvement construction. Annual maintenance would bring \$16,000 per year into the local economy. Under Alternative 4 there would be \$120,000 spent on construction and \$6,200 annually on maintenance of range improvements in the local economy.

31-b. I think to make a rigid comparison of the economic aspects of each alternative, one has to figure the true costs and the true benefits relative to the taxpayers and the Nation as a whole and not just to the region.

Response: The net present worth calculations done for this EIS were intended to portray the relative impacts on the local economy of the alternatives. It is not a comprehensive benefit/cost analysis which considers all social costs and benefits. This type of analysis will however be accomplished at the allotment management plan level.

Jeff Siddoway - Idaho Woolgrowers Association

32-a. I think there are some benefits of the Proposed Action that perhaps haven't been counted in the EIS: Not only the increased AUMs but the gains in the management benefits of less work and where a manager's time could be better spent. That perhaps increases the efficiency and output of an overall operation.

Response: The benefits of less work and better use of the manager's time are highly variable, depending on factors such as the individual's managerial ability. It is not possible for the Bureau to estimate these types of benefits.



## ERRATA SHEET

Changes and additions to the draft EIS text in addition to those listed below are referenced in comment responses 1-a, 18-a, 20-f, 20-k, 20-m and 20-p.

### Page 9

#### Table 2-3 Summary of Proposed Action and Alternatives Section 3

Change burn acres, Proposed Action column to 55,000.

### Page 23

#### Table 2-13 Proposed and Existing Use, Alternative 3, Increased Livestock Use

Place an asterisk (\*) after 43,641 AUMs.

### Page 33

#### Table 2-9 Comparative Analysis of Impacts

In the recreation section, Alternative 4 column, change 40 percent and 10 percent decrease to 40 percent and 10 percent increase.

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